

REMARKS

The indication of allowable subject matter in claim 4 is acknowledged and appreciated. In view of the following remarks, it is respectfully submitted that all claims are in condition for allowance.

Claims 1 and 5-11 stand rejected under 35 U.S.C. § 112, second paragraph. This rejection is respectfully traversed for the following reasons:

The Examiner alleges that it “is unclear which” parameter/feature set forth in the claims is predetermined. The Examiner’s confusion is not entirely understood. For example, with respect to the “spacing”, “wiring layer” and “position”, it is respectfully submitted that the Examiner’s assertion is directed to claim *scope* rather than claim *definiteness*. As set forth in MPEP § 2173.04, claim breadth is not indefiniteness. Accordingly, Applicants need not define precisely “which” spacing, wiring layer, or position is being referenced. The claims can embody any spacing, wiring layer, and position.

Further, it is respectfully submitted that “a predetermined ordinal number” simply embodies a reference value to which the recited ordinal numbers can be compared. For example, with respect to claim 1, line 9, the “predetermined ordinal number” is not referring back to the “ordinal numbers” recited at line 8. Rather, the “predetermined ordinal number” is a reference which can be used for comparison to the “interconnection lines for bits of ordinal numbers”, by which the spacing between interconnection lines can be determined (i.e., if ordinal numbers equal to or more than the predetermined ordinal number, then the lines are placed at the predetermined spacing; and if the ordinal numbers are less than the predetermined ordinal number, then the lines are placed at a spacing exceeding the predetermined spacing).

Based on the foregoing, it is submitted that claims 1 and 5-11 are definite.

Accordingly, it is respectfully requested that the rejection of claims 1 and 5-11 under 35 U.S.C. § 112, second paragraph be withdrawn.

Claims 2 and 3 stand rejected under 35 U.S.C. § 102 as being anticipated by

~~Applicants' Admitted Prior Art ("AAPA"). This rejection is respectfully traversed for the~~
following reasons.

Claim 2 recites in pertinent part, "the plurality of interconnection lines are placed ... so that interconnection lines having a high signal change frequency and interconnection lines having a low signal change frequency are adjacent to each other" (emphasis added). Accordingly, at least one of the interconnection lines is sandwiched by a pair of interconnection lines having a different change frequency. For example, as shown in Figure 2 of Applicants' drawings, at least one high change frequency line 10 is sandwiched by a pair of low change frequency lines 20. As described on page 25, lines 18-23 of Applicants' specification, such a construction can provide shielding for lines 10 so as to enable minimizing an increase in signal propagation delay.

In contrast, AAPA as depicted in Figure 17 discloses only the two innermost interconnection lines having different change frequencies as being adjacent so that none of the interconnection lines are sandwiched by lines having a different change frequency. Accordingly, AAPA is subject to a higher probability of an increase in signal propagation delay as described on page 4, lines 2-19 of Applicants' specification.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*,

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808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that AAPA does not anticipate claim 2, nor any claim dependent thereon. It is therefore respectfully submitted that claims 2 and 3 are patentable over AAPA. Accordingly, it is respectfully requested that the rejection of claims 2 and 3 under 35 U.S.C. § 102 be withdrawn.

CONCLUSION

Having fully and completely responded to the Office Action, Applicants submit that all of the claims are now in condition for allowance, an indication of which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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